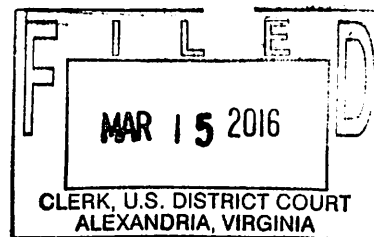


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA

v.

HALIL FALYALI,

HUSNU FALYALI,

and

OZGUR DEMIR,

Defendants.

)
)
) No. 1:16-cr-68
)
) COUNT ONE:
)
) Money Laundering Conspiracy
) 18 U.S.C. § 1956(h)
)
)
) FORFEITURE NOTICE
)
)

INDICTMENT

March 2016 Term – At Alexandria, Virginia

THE GRAND JURY CHARGES THAT:

Beginning in or around May 2012 and continuing through on or about September 28, 2012, in the Eastern District of Virginia and elsewhere, the defendants HALIL FALYALI, HUSNU FALYALI, and OZGUR DEMIR, together with others known and unknown to the Grand Jury, did knowingly and willfully conspire to transport, transmit and transfer a monetary instrument and funds from a place in the United States to and through a place outside the United States and to a place in the United States from and through a place outside the United States knowing that the monetary instrument or funds involved in the transportation, transmission, or transfer represented the proceeds of some form of unlawful activity, to wit: cocaine trafficking, knowing that such transportation, transmission, or transfer was designed in whole or in part to

conceal and disguise the nature, location, source, ownership and control of the proceeds of the specified unlawful activities, contrary to Title 18, United States Code, Section 1956(a)(2)(B)(i).

(In violation of Title 18, United States Code, Section 1956(h).)

FORFEITURE NOTICE

Pursuant to Rule 32.2(a), the defendants are hereby notified that, if convicted of the money laundering charge defendants shall forfeit to the United States real or personal property involved in the offense, or any property traceable to such property, pursuant to Title 18, United States Code, Section 982(a), in addition to any property, real or personal, which constitutes or is derived from proceeds traceable to cocaine trafficking, including a sum of money equal to at least \$30,000.00 in United States currency, representing the amount of proceeds obtained as a result of the conspiracy charged in Count One.

Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c) and by Title 18, United States Code, Section 982(b)(2), the defendant shall forfeit substitute property, up to the value of the amount described, i.e., \$30,000.00 in United States currency as to Count One

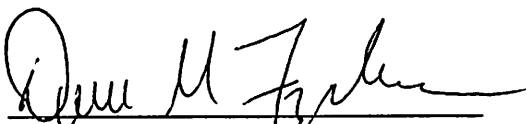
A TRUE BILL

Pursuant to the U.S. Government Act,
the original of this page has been filed
under seal in the Clerk's Office.

FOREPERSON

DANA J. BOENTE
UNITED STATES ATTORNEY

By:


Dennis M. Fitzpatrick
Assistant United States Attorney